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February 19, 2004

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Ms. Barbara Leczynski
Room 7405 M
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue
Washington, D.C. 20640

Dear Barbara:

I am writing to request your assistance in removing the entries for BASF Corporation from the list of "Tentative ICCA" commitments in the EPA HPV Challenge Summary Report for November 21, 2003. Tentative ICCA designations are given for BASF sponsorships in association with the following consortiums:

- ACC Amines HPV Panel
- ACC Chelants/Chelates Panel
- ACC Diisocyanates Panel
- Xanthine Consortium (BASF/Bell Flavors & Fragrances, Inc.)
- ACC Phthalic Anhydride Producers Task Group

I can confirm that BASF Corporation is a member of all of the above consortia. In fact, EPA lists their membership in the ICCA commitments portion of the summary report for the amines, chelants/chelates and diisocyanates groups. I reported their membership in the amines group in my reports of April and August 2002.

My report on the commitment by the ACC chelants/chelates and diisocyanates groups was provided in August, 2000. At that time, I just provided information on the consortium commitment and a technical contact. Afterwards, beginning in January 2002 at EPA's request, I provided information on membership on consortia membership at the same time as the commitment was reported. However, as I made clear in my letters of 3/27/03, 7/14/03, and 10/7/03, we do not attempt to update information regarding membership in consortia since it is readily available from the technical contact or the ICCA tracking site if needed. In the cases of the Xanthine and Phthalic Anhydride consortia, BASF's membership was added after I reported the commitments. BASF did inform EPA of their membership in all of these cases, however, and the information could have been easily verified.

If you have any questions, please contact me. I would also appreciate receiving confirmation when the removal has taken place.

Sincerely,

Frederick C. McEldowney
Chair, ICCA HPV Work Group

cc:

Karen Hoffman, EPA
Ward Penberthy, EPA
S. Russell
J. Keith
M. Walls
R. Denison, ED
R. Parod, BASF Corporation.